

EXHIBIT V

CIVIL DISTRICT COURT
FOR THE PARISH OF ORLEANS
STATE OF LOUISIANA

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VITA C. CHENET, : No. 2018-12536
Plaintiff, : Section 6
: Division "L"
V. :
COLGATE-PALMOLIVE :
CO., et al., :
Defendants. :

- - -

MARCH 4, 2021

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Remote deposition of
JACQUELINE MOLINE, M.D., commencing at
11:06 a.m., on the above date, before
Margaret Peoples, a Registered
Professional Reporter and Notary Public
in and for the States of Pennsylvania,
New York and Connecticut.

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1 I'm going to keep going, and then
2 I guess we can make a record on
3 this.

4 BY MR. MULARCZYK:

5 Q. All right. Dr. Moline, I'm
6 showing you your expert report in the
7 Betty Bell case that's dated May 5, 2016.

8 Do you see that?

9 A. Yes.

10 MS. CHEEK: Object to the
11 form. I'm going to object to this
12 entire line of questioning. And I
13 think you're borderline blowing
14 some privacy issues here also.

15 Leah Kagan needs to be on
16 the call if you're going to ask
17 questions in a deposition that
18 anyone can get a copy of, that I
19 do not represent.

20 MR. MULARCZYK: I guess,
21 what's the distinction between
22 this and Dr. Moline being
23 cross-examined on any one of her
24 other prior cases in any other

1 case?

2 MS. CHEEK: Counsel for this
3 plaintiff is not here. And this
4 case has -- Betty Bell is not the
5 plaintiff. We are here on Vita
6 Chenet.

7 So you sitting here and
8 trying to go into something for a
9 totally different person that I
10 know nothing about, it's
11 detrimental to my case and to my
12 client and to my time.

13 MR. MULARCZYK: So do you
14 require counsel to be present on
15 any prior case that your experts
16 get cross-examined on?

17 MS. CHEEK: I'm not
18 testifying today. All right. I'm
19 telling you this is inappropriate.
20 I don't see the point. It's
21 irrelevant to this case.

22 I get what you're trying to
23 do. But this is a -- you're
24 trying to do a trial cross here,

1 and this is not the time to do
2 that.

3 And you're not licensed in
4 Louisiana, and I'm not going to --
5 which I have an agreement with,
6 but this is --

7 MR. MULARCZYK: I guess I'm
8 still not hearing what the
9 objection is.

10 MS. CHEEK: Relevance. Way
11 outside the scope of the
12 deposition notice. I don't know
13 anything about this case. There's
14 no foundation. A plethora of good
15 objection basis there, too.

16 You can ask her questions.
17 And if she wants to answer, that's
18 her prerogative. I'm telling you
19 this is inappropriate.

20 BY MR. MULARCZYK:

21 Q. Dr. Moline, let me ask you
22 broadly speaking. Based on what you know
23 about Ms. Betty Bell's case and her
24 occupational history, would this have

1 been a case that you would have included
2 or excluded from the paper?

3 MS. CHEEK: Object to the
4 form.

5 THE WITNESS: I'm not going
6 to discuss that because that's
7 identifying whether someone might
8 or might not be in the paper.

9 BY MR. MULARCZYK:

10 Q. Okay. Let me show you a
11 different report.

12 Dr. Moline, I'm now showing
13 you your expert report in the case of
14 Doris Jackson, dated May 3, 2016.

15 Do you see this?

16 A. Yes.

17 Q. Based on the circumstances
18 that you're aware of for Ms. Jackson's
19 case, would this have been a case that
20 you would have excluded or included as --

21 MS. CHEEK: Object --

22 MR. MULARCZYK: Sorry. I
23 wasn't done yet.

24 BY MR. MULARCZYK:

1 Q. Would this have been a case
2 that you would have included or excluded
3 under the umbrella of no known exposure
4 to asbestos from your paper?

5 MS. CHEEK: Object to the
6 form.

7 THE WITNESS: I am not going
8 to go through every case I have
9 ever written a report about and
10 tell you whether I would have
11 included or excluded them in a
12 backward fishing expedition for
13 you to get me to identify who
14 might be in the paper.

15 So I will not answer
16 questions about individual cases
17 in the context of whether they
18 would have been included or not in
19 the paper.

20 MR. MULARCZYK: Just to make
21 the record clear, I'm asking these
22 questions because in Ms. Chenet's
23 case there have been essentially
24 33 other cases that have been

C E R T I F I C A T E

I HEREBY CERTIFY that the
witness was duly remotely sworn by me and
that the remote deposition is a true
record of the testimony given by the
witness.



Margaret Peoples, RPR

Dated: March 4, 2021

(The foregoing certification
of this transcript does not apply to any
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